

**INITIAL ENVIRONMENTAL EXAMINATION
AND REQUEST FOR A
CATEGORICAL EXCLUSION**

PROGRAM/ACTIVITY DATA:

Program/Activity Number: 690-014

Country/Region: Southern Africa (RCSA)

Program/Activity Title: SO 14: A More Competitive Southern African Economy -- Trade Expansion for Southern Africa (TESA) Activity

Funding Begin: FY04 **Funding End:** FY 10 **LOP Amount:** \$ 57,944,000

Sub-Activity Amount: \$ N/A

IEE Prepared By: Jeremy N. Burgess & Karen Menczer, Independent Consultants, and Lisa Whitley, Program Economist, RCSA

Current Date: June 2, 2004

IEE Amendment (Y/N): No

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion: X Negative Determination: X
Positive Determination: Deferral:

ADDITIONAL ELEMENTS: (Place X where applicable)

CONDITIONS X PVO/NGO:

SUMMARY OF FINDINGS:

Categorical exclusions are recommended for illustrative activities proposed under Components 1, 3, 4, and 5 of the TESA Activity, which broadly include the following:

- Component 1 - Capacity Building and Policy Reform for Trade and Competitiveness
- Component 3 - Trade Facilitation
- Component 4 - Financial Services for Trade and Competitiveness.
- Component 5 - The Dialogue for Competitiveness

These four components and their associated interventions are mainly focused on improving the enabling environment for increasing trade in the Southern Africa region. Therefore, illustrative interventions under these components are covered by categorical exclusions for education, technical assistance, and training (216.2(c)(2)(i)); analyses, studies, and workshops (216.2(c)(2)(iii)); information transfers (216.2(c)(2)(v)); programs involving nutrition, health care, or population and family planning services, except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.) (216.2(c)(2)(viii)); and programs intended to develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).

For **Component 4**, *Financial Services for Trade and Competitiveness*, opportunities should be sought to ensure that adequate environmentally and socially responsible banking policies and practices are in place. See Section 3.2.

A negative determination with conditions is recommended for illustrative activities implemented under Component 2, *Sector Development*. This component will identify industry sub-sectors or clusters with the greatest promise for enhanced, regionally integrated production. The component will provide market opportunities for enterprises in sectors such as textiles, agro-processing and tourism industries to increase their competitiveness.

Individually, Component 2 interventions may be categorically excludable. However, at the specific activity or cluster level, potential environmental consequences could result from local or cumulative impacts. These should be considered during the sub-sector or cluster identification and selection process. For Component 2, as **conditions** for the recommended negative threshold decision, the following measures shall be incorporated in the work planning and implementation stages to ensure that environmental concerns are considered early on in TESA Activity development and that potential environmental consequences are monitored and mitigated throughout the Life of Activity (LOA):

- 1) Based on the undetermined potential for harm of the interventions in targeted sub-sectors or clusters, the USAID Africa Bureau environmental review process shall be applied as a preliminary screen, i.e., the **Environmental Review Report (ERR) process**. This will lead to a determination as to what sort of further review and mitigation may be appropriate, if any. The outcomes called for as a result of the ERR process typically may include (a) no further review needed; (b) preparation of a short environmental review report; or (c) a full environmental assessment. Rarely, an IEE amendment may be called for. A blank template of the ERR (2 pp.) and instructions (7 pp.) are attached as Annex 1 to this IEE.
- 2) During analyses to determine which target sub-sectors or clusters will receive TESA support, environmental criteria (along with economic, gender, and other criteria) shall be used to ensure that support does not cause preventable harm to the biophysical environment, and that efforts are made to reduce the negative impacts from those enterprises. In the decision to target specific industry sub-sectors, implementing partners shall clearly show how environmental criteria were used in deciding on the nature of the support and project design. The RCSA Regional Environmental Advisor (REA) shall be involved in the sub-sector identification exercise to ensure that environmental criteria are adequately considered.
- 3) Once sub-sectors/clusters are chosen, additional safeguards may be needed to ensure that there will be no negative environmental consequences. During work planning exercises throughout LOA, environmental safeguards shall be proposed that will mitigate environmental consequences of sub-sector or cluster development/strengthening. The Cognizant Technical Officer (CTO) shall collaborate with the REA and chosen partners to develop environmental safeguards to be incorporated into business development activities of the sub-sectors or clusters.
- 4) Quarterly Reports shall describe environmental criteria used to evaluate and select target sub-sectors or clusters; additional environmental safeguards to be incorporated; and implementation and evaluation of the adequacy of the safeguards.
- 5) Implementation of environmental safeguards shall be tracked in the RCSA Performance Monitoring Plan, as appropriate
- 6) The SO team will also ensure that provisions of the IEE concerning mitigation measures and the conditions specified herein along with the requirement to monitor be incorporated in all contracts, cooperative agreements, grants and subgrants.

GMOs & Pesticides. This examination does not cover development of or trade in new technologies involving genetically-modified organisms (GMOs) or life-modified organisms (LMOs). Nor does it cover pesticides, including their procurement, use, transport, storage or disposal. See Sect. 3.2 for details.

As required by ADS 204.5.4, the SO team and activity implementing partners will "actively monitor and evaluate whether the environmental features designed for the activity resulting from the 22 CFR 216 process are being implemented effectively and whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed in accordance with 22 CFR 216." If additional activities not described in this document are added to this program, an amended environmental examination must be prepared and approved.

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:

Mission Director: _____/cleared/_____
Dawn Thomas, Acting

Date: 6/15/04

CONCURRENCE:

Bureau Environmental Officer: _____/cleared/_____
Paul Des Rosiers, Acting

Date: 6/22/04

Approved: X

Disapproved: _____

Filename: _ 34RCSA2_SO14_Trade.doc (USAID/W BEO)

ADDITIONAL CLEARANCES: (Add as appropriate; type name under signature line)

Mission Environmental

Officer: _____/cleared/_____
Marcia Musisi-Nkambwe

Date: 6/15/04

Activity Manager: _____/cleared/_____
Lisa Whitley

Date: 6/15/04

SO Team Leader: _____/cleared/_____
Lisa Whitley

Date: 6/15/04

Regional Environmental Officer: _____/cleared/_____
(REDSO) Mary Hobbs

Date: May 30, 2004

Senior Regional Environmental

Officer (REDSO): _____/cleared/_____
Walter Knausenberger

Date: June 3, 2004

Regional Environmental Policy Advisor: _____/cleared/_____
(AFR/SD) Brian Hirsch

Date: June 21, 2004

Optional Clearances:

General Counsel
(Africa Bureau) _____
Mary Alice Kleinjan

Date: _____

Regional Legal Advisor: _____

Date: _____

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA:

Program/Activity Number: 690-014

Country/Region: Southern Africa (RCSA)

Program/Activity Title: SO 14, A More Competitive Southern African Economy Trade Expansion for Southern Africa (TESA)

1.0 BACKGROUND AND PROJECT DESCRIPTION

1.1 Purpose and Scope of IEE

The purpose of this Initial Environmental Examination (IEE) is to identify the reasonably foreseeable environmental effects of activities that will be conducted under the Trade Expansion for Southern Africa (TESA Activity). The TESA Activity will be RCSA's main vehicle for achieving the overall objectives of SO 14: A More Competitive Southern African Economy. Illustrative interventions under consideration to accomplish these objectives are described in greater detail below.

This IEE:

- Describes the illustrative interventions and applicable categorical exclusions
- Identifies activity components that may have environmental consequences
- Recommends mitigation and additional environmental review for certain interventions, and
- Based on the extent of the intervention and impacts, recommends the applicable level of environmental review (Environmental Review Report (ERR) versus IEE versus EA) and level of approval (Mission Environmental Officer/Regional Environmental Advisor (MEO/REA) versus USAID/Washington Bureau Environmental Officer) that will be needed.

TESA support may be delivered through technical assistance, technology transfer, training, research, studies, analyses, workshops, and by leveraging resources. None of the interventions currently identified is expected to have significant effects on the environment, as defined in 216.2 (d)(1), and therefore, it is unlikely that an EA will be required. However, since the specific target sub-sectors or clusters and corresponding interventions have yet to be identified (Component 2, IR 14.2), it is currently not possible to predict the full range and significance of environmental consequences for this Activity.

1.2 Background and Purpose

Indicators for Southern Africa show a region with overall declining terms of trade, GDP growth inferior to demographic expansion, and slow foreign investment, both direct and portfolio. RCSA, along with other major donors to the region, understands that increased trade can be the engine of economic growth and poverty reduction. For exports to grow, trade policy requires further liberalization, trade facilitation barriers must be diminished, competition regulated, and production boosted. The five components of the Trade Expansion for Southern Africa (TESA) Program focus on each of these issues.

1.3 Activity Description

The TESA Activity will contribute to SO 14's three intermediate results (IR) –

- IR 14.1: enhanced policy and regulatory environment for free trade and competition;

- IR 14.2: strengthened capacity of targeted clusters to produce and market competitive goods and services; and
- IR 14.3: reduced key transaction costs.

TESA consists of five Activity components that address the three IRs listed above:

Component 1 - Capacity Building and Policy Reform for Trade and Competitiveness contributes to the capacity-building objective of IR14.1. It will engage trade ministries, research institutes, university faculties, business networks and associations and other stakeholder groups to formulate policy conducive to expansion of regional trade and to the region's deeper integration with the multilateral trading system. Illustrative interventions under Component 1 include:

- Training in specific policy issues, and, as appropriate, negotiation skills, to enable Southern African negotiators to participate more fully in multi-lateral and bilateral trade negotiations
- Demand-driven studies and training as specifically requested by the BLNS in their TCB strategies developed for the U.S.-SACU FTA negotiations
- Studies to inform governments of the impacts of specific policy changes. Topics of these studies will vary widely but could include market access (including tariff structures, rules of origin and investment), competition law, as well as the impact of various macroeconomic policies on competitiveness
- Technical assistance to implement policy changes (for example, drafting new regulations)
- Training and workshops for government ministries on HIV/AIDs mitigation measures
- As requested, training for government ministries to enable them to conduct their own policy analysis

Component 2 - Sector Development is the implementation element under IR14.2. It will identify industry sub-sectors and value chains with the greatest promise for enhanced, regionally integrated production. This component will link closely to all of the other components under TESA, so that regulatory and policy impediments confronting the targeted industries can be eliminated or diminished. Illustrative interventions under Component 2 include:

- Technical assistance for marketing, production, and management for firms in targeted sub-sectors
- Focused market analyses and information systems to help build linkages between Southern African firms and export markets in the U.S. (and other international markets)
- Technical assistance via workshops and direct support to build the capacity of business associations to deliver assistance to firms in targeted sub-sectors
- Training on HIV/AIDs mitigation measures targeted at SMEs

Component 3 - Trade Facilitation contributes to the objectives of IR14.3 for reducing transaction costs. It will focus largely on constraints in trade facilitation: customs procedures and clearances, loading and unloading efficiencies, and transit of goods. More broadly, it will look to address regulatory positions that increase the cost of inputs, especially in services. Illustrative interventions under Component 3 include:

- Technical assistance to support the implementation of corridor agreements and develop new agreements
- Training for customs and border officials on new transport security initiatives
- Training for customs and border officials on new procedures necessary to implement U.S.-SACU agreement in trade facilitation

- Outreach through workshops and studies for key government ministries and the private sector on issues such as customs and border procedures (both ports and land), transport policies (e.g., harmonization of load limits for haulers), and visa policies for traveling business persons and tourists

Component 4 - Financial Services for Trade and Competitiveness is a sector-specific component under IR14.3. It will explore and propose solutions to a series of constraints in the banking sector that inhibit expeditious trade. As with the other components, it will have a regional scope. Interventions under this component will be largely limited—at least initially—to research and analysis to determine the viability of this focused approach. It will be essential to catalogue existing and potential constraints to the efficient provision of relevant services for the facilitation of trade. Research of this nature will involve a review of the financial sector in general.

Component 5 - The Dialogue for Competitiveness will contribute and support the other four TESA components as it works with collaborating partners to lobby to advocate for welfare-increasing policy and regulatory change. Illustrative interventions under Component 5 include:

- Training for private sector on the impact of key policy changes
- Support for policy analysis by regionally-based researchers
- Workshops to inform private sector stakeholders on the benefits of the U.S.-SACU agreement
- Broad dissemination of information about competitiveness-enhancing policies through the media, the Hub website, and high profile conferences

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

2.1 Locations Affected

The affected locations may include the southern African sub-region, which includes all countries in the SADC community:

Angola, Botswana, Lesotho, Malawi, Mozambique, Namibia, Swaziland, Tanzania, Zambia, and Zimbabwe, South Africa, Mauritius, and the Democratic Republic of the Congo (DRC).

Many interventions will be undertaken on a regional basis. For specific sub-sector or cluster activities under Component 2, no target countries have been identified. The implementing partner will be responsible for proposing the locations where specific interventions will be carried out.

2.2 National [or applicable] Environmental Policies and Procedures [of host country both for environmental assessment and pertaining to the sector]

Implementation of environmental procedures for countries within the region is limited. Available information is provided in Table 1.

Table 1
National Environmental Policies and Procedures in Place in Southern African Countries

Country	Environmental Legislation &/or Policy	Level of Implementation
Angola	<ul style="list-style-type: none"> • Constitutional law (Article 12, No. 2 and Article 24. Nos. 1, 2, and 3) commits the State to correctly use of natural resources, guaranteeing sustainable development for all. • Law No. 5/98 of June 19 1998 defines the concepts and basic principles of environmental protection, preservation and conservation, promotion of improved quality of life and 	GoA has limited capacity to guide, monitor and evaluate development activities through environmental review procedures. GOA has recently committed

Country	Environmental Legislation &/or Policy	Level of Implementation
	<p>a rational use of natural resources.</p> <ul style="list-style-type: none"> • Apart from this law (5/98), the GoA has committed itself to develop a National Program for Environmental Management, including all necessary structures and specialized organs, and creating the legislation that enables their enactment. • Since provision of portable water represents a major concern, the Angolan Ministry of Health committed itself to developing environmental regulations to control and monitor water and sanitary infrastructure incl. latrines 	itself to developing environmental regulations to control development activities, but the more detailed aspects of this initiative not likely to be available soon.
Botswana	Legislation on environment within certain Government Ministries and Departments. Over-arching environmental Policy lies with the National Conservation Strategy Agency (NCSA), the Draft Environmental Regulations have not yet been passed by Government.	NCSA insists on, and reviews EIAs for all development projects, specific ministries also require EIA according to their own format(s).
Lesotho	Lesotho National Environmental Policy Reinforces regulations within the sectoral ministries	Applied to large-scale projects e.g. LHDA – Katse Dam Project
Malawi	Has a Dedicated Ministry and National Legislation and Guidelines on Environmental Impacts of Development Projects	Documents are reviewed, but levels of implementation are a bit haphazard due to lack of manpower
Mozambique	<p>GRM's 1994 National Environment Management Program (NEMP) provides the framework for the development, adoption, and implementation of environmental policy measures in Mozambique. The legal framework has been updated, regulates access to natural resources, as well as the transfer of authority and decision-making to the local level. Other relevant laws:</p> <ul style="list-style-type: none"> - Environmental Law (1997) promotes community participation in planning and decision-making related to the utilisation of natural resources; - Land Law (1997), - Forestry and Wildlife Law (1999) - Local Government Law (1998), - Decree 15/2000 on working relations between local government and traditional authorities (2000), - Pesticides and Fertilizer Regulations (2002) 	Application of the main ENRM laws is the responsibility of the Ministry for the Co-Ordination of Environmental Action (MICOA) and the Ministry of Agriculture and Rural Development (MADER)
Namibia	The Directorate of Environmental Affairs (DEA) is one of four directorates under the Ministry of Environment and Tourism	Legislation only in draft form, but policies in place and enforced
South Africa	White Paper on Environmental Management Policy for South Africa (1997) National Environmental Management Act (1998)	Comprehensive Legislation and follow-up
Swaziland	Swaziland Environment Action Plan, no policy proposals in place Urban Land and Environment Policy exists	Uncertain: TBD
Tanzania	National Environmental Management Act (NEMA): DRAFT Tanzania Environmental Protection Act Environmental Impact Assessment Procedures	Policy and/or Regulations are adhered to for project design. The extent of follow-up is uncertain
Zambia	Environmental Protection and Pollution Control Act Has a dedicated Ministry: Ministry of Environment & Natural Resources	Regulations enforced by the Environmental Council of Zambia

Country	Environmental Legislation &/or Policy	Level of Implementation
	Regulations on: Air, Waste, Water and EIA	
Zimbabwe	Policy and the over-riding Natural Resources Act	Uncertain: TBD

Besides National environmental legislation, most countries also have regulations and guidelines covering the conservation of forests, soils, water and watersheds, rangelands, health and sanitation, disaster management, and civil rights.

3.0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

3.1 Stage of Environmental Review

This IEE is being conducted during the TESA Activity planning and design phase. At this stage, it is not possible to accurately identify the entire range of environmental effects and their significance.

Although many interventions can be categorically excluded (216.2 (c) (2)) at this stage, certain interventions may have environmental effects. Negative threshold decisions (no significant adverse environmental effects) are recommended for these interventions, and additional environmental review may be required once locations and specific activities are better defined during the work planning process.

3.2 Potential Environmental Consequences

There is sufficient information available to recommend categorical exclusions ((216.2(c)(2)) for illustrative activities to be implemented under Components 1, 3, 4, and 5. These interventions consist primarily of technical assistance and training, workshops, analyses, and studies, and will not directly affect the environment. Therefore, they are covered by categorical exclusions for: education, technical assistance, and training programs (216.2 (c) (2)(i)); analyses, studies, workshops and meetings (216.2(c)(2)(iii)); and studies, projects and programs intended to develop the capability to engage in development planning (216.2(c)(2)(xiv)).

For **Component 2, Sector Development**, because the locations and sub-sectors have not yet been identified, it is recommended that environmental safeguards be included in the proposal/work plan/implementation phases, to provide adequate protection as target sub-sectors/clusters and interventions are better defined. The interventions under Component 2 are intended to strengthen enterprises in target sub-sectors or clusters industries, and will be achieved through technical assistance and training, analyses, studies, and workshops, and information transfer. As such, Component 2 interventions may be covered by categorical exclusions for education, technical assistance, and training (216.2(c)(2)(i)), analyses, studies, and workshops (216.2(c)(2)(iii)), information transfers (216.2(c)(2)(v)), and studies, projects, or programs intended to develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)). However, due to concerns over potential cumulative impacts of the individual interventions, the categorical exclusions do not apply.

In addition, follow-on environmental review may be required once locations and specific interventions are better defined. Although it is not envisioned, if interventions under Component 2 have a direct effect on the environment, an amendment to this IEE shall be submitted to USAID Bureau Environmental Officer (BEO) requesting the appropriate threshold decision. Activities that could potentially have direct environmental effects include: construction or rehabilitation of infrastructure; improvements to drainage systems, water supplies, and irrigation; development of vacant land; trail building; and development of ecotourism attractions. At this time, no activities of this nature are foreseen, but the situation will be reassessed during the annual work planning process. At the work plan phase for each year of implementation, the REA shall be consulted to determine if an amended IEE is needed.

While Component 2 does plan to include training to help enterprises meet industry-specific labor, environmental, quality, and safety standards of export markets, there remain potential environmental concerns at the IR level. For example, increasing the competitiveness of the tourism sector may result in increased tourists to the Southern Africa region. While this will have positive economic benefits, there may be negative environmental consequences if appropriate safeguards are not put in place, such as limiting the number of tourists in sensitive environments; developing tourist destinations in an environmentally sustainable manner, and limiting the number of vehicles allowed in national parks.

Increasing competitiveness of agro-processing industries may result in increased incomes for farmers and associated service providers; however, environmental consequences may result due to increased incentives to put additional land into agricultural production; from construction of facilities to support agro-processing; from increased water use; or from associated sewage and sanitary waste issues.

Increasing competitiveness in the textiles/garments industry may result in new or rehabilitated textile/garment facilities and the associated pollution and water use concerns.

These concerns must be kept in mind and environmental considerations must be factored into the work with specific sub-sectors/clusters to ensure that adequate safeguards and environmental training are incorporated during implementation. These concerns are best addressed early in the process and should be addressed in contractor proposals and, as appropriate, during each year's work planning process.

Based on the potential extent of the intervention and impacts it is recommended that the USAID Africa Bureau environmental review process be applied, i.e., the **Environmental Review Report (ERR)**, as opposed to requiring an IEE amendment, or EA, unless these outcomes are called for as a result of the ERR process. This will involve various levels of approval (Mission Environmental Officer/Regional Environmental Advisor (MEO/REA) versus USAID/Washington Bureau Environmental Officer, as specified in the ERR.

For **Component 4 Financial Services for Trade and Competitiveness**, which will explore and propose solutions to a series of constraints in the banking sector that inhibit expeditious trade, opportunities should present themselves to ensure that adequate environmentally and socially responsible policies and practices are in place. For example, the USAID Development Credit Authority model loan portfolio guarantee lists various conditions for loan guarantees through this facility. DCA usually also is associated with complementary technical assistance which can promote such principles. Similarly, the "Equator Principles" represent a relatively new framework for financial institutions in determining, assessing and managing environmental & social risk in project financing. It is subscribed to by an ever-expanding number of major international banks. Here is the URL: <http://www.equator-principles.com/principles.shtml>. So, while a Categorical Exclusion is recommended for the activities under this Component, as noted already, it is also recommended that the SO Team look for options under this component to ensure that adequate environmentally and socially responsible policies and practices are in place.

GMOs This examination does not cover development of or trade in new technologies involving genetically-modified organisms (GMOs) or life-modified organisms (LMOs). Any support for laboratory- or field-based research, multiplication, or dissemination of GMOs or LMOs shall be subject to review under the Agency's Biosafety procedures, and the host country's biosafety authority or focal point.

Pesticides. This examination does not cover pesticides, including their procurement, use, transport, storage or disposal. Any pesticide activity considered under this program would necessitate the preparation of a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP), in accordance with AFR Bureau guidance and fulfilling all analytical elements required by 22CFR216.3(b), USAID's Pesticide Procedures.

4.0 RECOMMENDED THRESHOLD DECISIONS & MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

4.1 Recommended Threshold Decisions and Mitigation Actions (Including Monitoring and Evaluation)

Categorical exclusions are recommended for illustrative interventions implemented under Components 1, 3, 4, and 5, which broadly include the following:

- Component 1 - Capacity Building and Policy Reform for Trade and Competitiveness
- Component 3 - Trade Facilitation
- Component 4 - Financial Services for Trade and Competitiveness.
- Component 5 - The Dialogue for Competitiveness

These four components and their associated interventions are mainly focused on improving the enabling environment for increasing trade in the Southern Africa region. Illustrative interventions under these components are covered by categorical exclusions for education, technical assistance, and training (216.2(c)(2)(i)); analyses, studies, and workshops (216.2(c)(2)(iii)); information transfers (216.2(c)(2)(v)); programs involving nutrition, health care, or population and family planning services, except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment etc.) (216.2(c)(2)(viii)); and programs intended to develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).

A negative determination with conditions is recommended for illustrative activities implemented under Component 2, *Sector Development*. It will identify industry sub-sectors or clusters with the greatest promise for enhanced, regionally integrated production. The component will provide market opportunities for enterprises in sectors such as textiles, agro-processing and tourism industries to increase their competitiveness.

Individually, Component 2 interventions may be categorically excludable. However, at the specific sub-sector, cluster, or activity level, potential environmental consequences could result from local or cumulative impacts. These should be considered during the sub-sector or cluster identification and selection process.

4.2 Conditions for Screening, Mitigation, Monitoring and Evaluation

For Component 2, the following measures shall be incorporated in the work planning and implementation stages to ensure that environmental concerns are considered early on in TESA Activity development and that potential environmental consequences are monitored and mitigated throughout the Life of Activity. As **conditions** for the recommended negative threshold decision,

the following measures shall be incorporated in the work planning and implementation stages to ensure that environmental concerns are considered early on in TESA Activity development and that potential environmental consequences are monitored and mitigated throughout the Life of Activity.

- 1) Based on the undetermined potential for harm of the interventions in targeted sub-sectors or clusters, the USAID Africa Bureau environmental review process shall be applied as a preliminary screen, i.e., the **Environmental Review Report (ERR) process**. This will lead to a determination as to what sort of further review and mitigation may be appropriate, if any. The outcomes called for as a result of the ERR process typically may include (a) no further review needed; (b) preparation of a short environmental review report; or (c) a full environmental assessment. Rarely, an IEE amendment may be called for. A blank template of the ERR (2 pp.) and instructions (7 pp.) are attached as Annex 1 to this IEE.
- 2) During analyses to determine which target sub-sectors or clusters will receive TESA support, environmental criteria (along with economic, gender, and other criteria) shall be used to ensure that support does not cause preventable harm to the biophysical environment, and that efforts are made to reduce the negative impacts from those enterprises. In the decision to target specific industry sub-sectors, implementing partners shall clearly show how environmental criteria were used in deciding on the nature of the support and project design. The RCSA Regional Environmental Advisor (REA) shall be involved in the sub-sector identification exercise to ensure that environmental criteria are adequately considered.
- 3) Once sub-sectors/clusters are chosen, additional safeguards may be needed to ensure that there will be no negative environmental consequences. During work planning exercises throughout LOP, environmental safeguards shall be proposed that will mitigate environmental consequences of sub-sector or cluster development/strengthening. The CTO shall collaborate with the REA and chosen partners to develop environmental safeguards to be incorporated into business development activities of the sub-sectors or clusters.
- 4) Quarterly Reports shall describe environmental criteria used to evaluate and select target sub-sectors or clusters; additional environmental safeguards to be incorporated; and implementation and evaluation of the adequacy of the safeguards.
- 5) Implementation of environmental safeguards shall be tracked in the RCSA Performance Monitoring Plan, as appropriate.
- 6) The SO team will also ensure that provisions of the IEE concerning mitigation measures and the conditions specified herein along with the requirement to monitor be incorporated in all contracts, cooperative agreements, grants and subgrants.

For **Component 4 Financial Services for Trade and Competitiveness**, opportunities should be sought to ensure that adequate environmentally and socially responsible banking policies and practices are in place. See Section 3.2 for more detail.

GMOs & Pesticides. This examination does not cover development of or trade in new technologies involving genetically-modified organisms (GMOs) or life-modified organisms (LMOs). Nor does it cover pesticides, including their procurement, use, transport, storage or disposal. See Sect. 3.2 for details.

As required by ADS 204.5.4, the SO team and activity implementing partners will "actively monitor and evaluate whether the environmental features designed for the activity resulting from the 22 CFR 216 process are being implemented effectively and whether there are new or unforeseen consequences arising during implementation that were not identified and reviewed in

accordance with 22 CFR 216." If additional activities not described in this document are added to this program, an amended environmental examination must be prepared and approved.

ANNEX 1.

INSTRUCTIONS FOR AFRICA BUREAU ENVIRONMENTAL REVIEW AND REPORT (ERR) FORM

NOTE TO INDIVIDUALS ADAPTING THIS FORM FOR USE ON A PARTICULAR PROGRAM/ACTIVITY:

- These instructions accompany the generic “Environmental Review & Report Form.”
- The Environmental Review Form and these instructions are for use in the review and approval of subproject proposals that are (1) carried out under an “umbrella” project AND (2) defined and reviewed *after* approval of the overall or “umbrella project.” Typical subprojects include microfinance activities or subgrants for small-scale development.
- For primarily NRM-oriented programs, consider and use the Supplemental Environmental Review Form for NRM sector activities, especially those considering NRM-based enterprises, CBNRM, ecotourism, etc..
- Underlined & blue-highlighted text MUST be modified to reflect project and mission name.
- Yellow highlighted text is only put emphasis on the points highlighted, and can also be dropped
- Both the form AND instructions should be reviewed and modified in general to reflect the needs of the specific umbrella project.
- Both form and instructions must be appended to the Initial Environmental Examination for the overall project.

DELETE THIS PAGE BEFORE MODIFYING/DISTRIBUTING THIS FORM

INSTRUCTIONS FOR AFRICA BUREAU ENVIRONMENTAL REVIEW AND REPORT (ERR) FORM¹



USAID/mission or bureau name
Instructions for environmental review of activities under the XXX
project

NOTE: THESE INSTRUCTIONS ACCOMPANY THE
“ENVIRONMENTAL REVIEW & REPORT FORM FOR XXX
PROJECT ACTIVITIES.” FOLLOW, BUT DO NOT SUBMIT,
THESE INSTRUCTIONS.

Who must submit the Environmental Review Form²?

All organizations applying to implement activities on the XXX Project must complete the “Environmental Review Form” form UNLESS the project or activity is carried out to address an emergency (e.g., international disaster assistance). *Emergencies are determined by the US Ambassador or USAID, not by the applicant.*³

Importance

The proposed activity cannot be approved and no “irreversible commitment of resources” can be made until the environmental documentation, including any mitigation measures, is approved by the Mission Environmental Officer (MEO). Approval by other authorities in USAID may also be required.

NOTE: USAID may request modifications, or reject the documentation.

If the activities are found to have significant adverse impacts, a full Environmental Assessment must be conducted.

STEP 1. PROVIDE REQUESTED “APPLICANT INFORMATION”

(SECTION A OF THE FORM)

STEP 2. LIST ALL PROPOSED ACTIVITIES

In Section B of the form, list all proposed activities. Include all phases: *planning, design, construction, operation & maintenance*. Include ancillary activities. (These are activities that are required to build or operate the primary activity. Examples include building or improving a road so that heavy vehicles can reach the project site, excavation of fill material or gravel for construction, provision of electricity, water, or sewage facilities, disposal of solid waste, etc.)

STEP 3A. SCREENING: IDENTIFY LOW-RISK AND HIGH-RISK ACTIVITIES

For *each* activity you have listed in Section B of the form, refer to the list below to determine whether it is a listed low-risk or high-risk activity.

If an activity is specifically identified as “very low risk” or “high risk” in the list below, indicate this in the “screening result” column in Section B of the form.

¹ Last revised April 13, 2004, to include biosafety considerations and better reflect the Supplemental Environmental Review Form for NRM sector activities.

² See separate ERR Approval Form (2 p.) for submission. Also consider if the Supplemental NRM Screening Form applies.

³ See 22 CFR §216.2(b)(1). Most activities carried out under emergency circumstances are considered EXEMPT from USAID environmental procedures, except for the procurement or use of pesticides

Very low-risk activities (Activities with low potential for adverse biophysical or health impacts; including §216.2(c)(2))	High-risk activities (Activities with high potential for adverse biophysical or health impacts; including §216.2(d)(1))
<p>Provision of education, technical assistance, or training. (Note that activities directly affecting the environment. do not qualify.)</p> <p>Community awareness initiatives.</p> <p>Controlled agricultural experimentation exclusively for the purpose of research and field evaluation confined to small areas (normally under 4 ha./10 acres). This must be carefully monitored and no protected or other sensitive environmental areas may be affected).</p> <p>Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats.</p> <p>Document or information transfers.</p> <p>Nutrition, health care or family planning, EXCEPT when (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) biohazardous (esp. HIV/AIDS) waste is handled or blood is tested.</p> <p>Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices. Water points must be located where no protected or other sensitive environmental areas could be affected.</p> <p>NOTE: USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.</p> <p>Construction or repair of facilities if total surface area to be disturbed is under 10,000 sq. ft. (approx. 1,000 sq. m.) (and when no protected or other sensitive environmental areas could be affected).</p> <p>Support for intermediate credit arrangements (when no significant biophysical environmental impact can reasonably be expected).</p> <p>Programs of maternal and child feeding conducted under Title II of Public Law 480.</p> <p>Food for development programs under Title III of P.L. 480, when no on-the-ground biophysical interventions are likely.</p> <p>Studies or programs intended to develop the capability of recipients to engage in development planning. (Does NOT include activities directly affecting the environment)</p> <p>Small-scale Natural Resource Management</p>	<p>River basin or new lands development</p> <p>Planned resettlement of human populations</p> <p>Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas</p> <p>Substantial piped water supply and sewerage construction</p> <p>Major bore hole or water point construction</p> <p>Large-scale irrigation</p> <p>Water management structures such as dams and impoundments</p> <p>Drainage of wetlands or other permanently flooded areas</p> <p>Large-scale agricultural mechanization</p> <p>Agricultural land leveling</p> <p>Procurement or use of <u>restricted use</u> pesticides, or wide-area application in non-emergency conditions under non-supervised conditions. (Consult MEO.)</p> <p>Light industrial plant production or processing (e.g, sawmill operation, agro-industrial processing of forestry products, tanneries, cloth-dyeing operations).</p> <p>High-risk and typically not funded by USAID:</p> <p>Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals</p> <p>Actions determined likely to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)</p> <p>Conversion of forest lands to rearing of livestock</p> <p>Planned colonization of forest lands</p> <p>Procurement or use of timber harvesting equipment</p> <p>Commercial extraction of timber</p> <p>Construction of dams or other water control structures that flood relatively undegraded forest lands</p> <p>Construction, upgrading or maintenance of</p>

Very low-risk activities (Activities with low potential for adverse biophysical or health impacts; including §216.2(c)(2))	High-risk activities (Activities with high potential for adverse biophysical or health impacts; including §216.2(d)(1))
activities for which the answer to ALL SUPPLEMENTAL SCREENING QUESTIONS (attached) is “NO.”	roads that pass through relatively undegraded forest lands. (Includes temporary haul roads for logging or other extractive industries)

(This list of activities is taken from the text of Regulation 216 and other applicable laws, regulations and directives)

STEP 3B: IDENTIFYING ACTIVITIES OF UNKNOWN OR MODERATE RISK.

All activities NOT identified as “very low risk” or “very high risk” are considered to be of “unknown or moderate risk.” Common examples of moderate-risk activities are given in the table below.

Check “moderate or unknown risk” under screening results in Section B of the form for ALL such activities.

Common examples of moderate-risk activities	
CAUTION: If ANY of the activities listed in this table may adversely impact (1) protected areas, (2) other sensitive environmental areas, or (3) threatened and endangered species and their habitat, THEY ARE NOT MODERATE RISK. All such activities are HIGH RISK ACTIVITIES.	
<p>Small-scale agriculture, NRM, sanitation, etc. <u>define what is meant by “small-scale” for each project</u>.</p> <p>Controlled and carefully monitored agricultural experimentation exclusively for the purpose of research and field evaluation of MORE than 4 ha.</p> <p>NOTE: No biotechnology testing or release of any kind are to take place within an assisted country until the host countries involved have drafted and approved a regulatory framework governing biotechnology and biosafety.</p> <p><i>All USAID-funded interventions which involve biotechnologies are to be informed by the ADS 211 series governing "Biosafety Procedures for Genetic Engineering Research". In particular this guidance details the required written approval procedures needed before transferring or releasing GE products to the field.</i></p> <p>Moderate scale construction or rehabilitation of facilities or structures <u>surface area to be disturbed exceeds 10,000 sq. ft (1000 sq meters) but funding level is \$200,000 or less</u>.</p> <p>Construction or rehabilitation of rural roads meeting the following criteria:</p> <ul style="list-style-type: none"> ▪ Length of road work is less than ~10 km ▪ No change in alignment or right of way ▪ Ecologically sensitive areas are at least 100 m away from the road and not affected by construction or changes in drainage. ▪ No protected areas or relatively undegraded forest are within 5 km of the road. <p>Food for Development programs under Title II or III, involving small-scale infrastructure with the known potential to cause environmental harm</p>	<p>Construction or rehabilitation of small-scale water points or water storage devices for domestic or non-domestic use. (Covers activities NOT included under “Very low risk activities” above.)</p> <p>NOTE: USAID guidance on water quality requires testing for arsenic, nitrates, nitrites and coliform bacteria.</p> <p>Support for intermediate credit institutions when indirect environmental harm conceivably could result.</p> <p>Institutional support grants to NGOs/PVOs when the activities of the organizations are known and may reasonably have adverse environmental impact.</p> <p>Small-scale use of USEPA-registered, least-toxic general-use pesticides. Use must be limited to NGO-supervised use by farmers, demonstration, training and education, or emergency assistance.</p> <p>NOTE: Environmental review (see step 5) must be carried out consistent with USAID Pesticide Procedures as required in Reg. 16 [22 CFR 216.3(b)(1)].</p> <p>Nutrition, health care or family planning, if (a) some included activities could directly affect the environment (e.g., construction, supply systems, etc.) or (b) biohazardous healthcare waste (esp. HIV/AIDS) is produced, syringes are used, or blood is tested.</p>

Common examples of moderate-risk activities	
CAUTION: If ANY of the activities listed in this table may adversely impact (1) protected areas, (2) other sensitive environmental areas, or (3) threatened and endangered species and their habitat, THEY ARE NOT MODERATE RISK. All such activities are HIGH RISK ACTIVITIES.	
(e.g., roads, bore holes). Quantity imports of commodities such as fertilizers. Technical studies and analyses or similar activities that could involve intrusive sampling, of endangered species or critical habitats. (Includes aerial sampling.)	

STEP 4. DETERMINE IF YOU MUST WRITE AN ENVIRONMENTAL REVIEW REPORT

Examine the “screening results” as they are entered in Table 1 of the form.

- If ALL the activities are “very low risk,” then no further review is necessary. In Section C of the form, check the box labeled “very low risk activities.” Skip to Step 8 of these instructions.
- If ANY activities are “unknown or moderate risk,” you MUST complete an ENVIRONMENTAL REVIEW REPORT addressing these activities. Proceed to Step 5.
- If ANY activities are “high risk,” note that USAID’s regulations usually require a full environmental assessment study (EA). Because these activities are assumed to have a high probability of causing significant, adverse environmental impacts, they are closely scrutinized. Any proposed high-risk activity should be discussed in advance with USAID.

In some cases, it is possible that effective mitigation and monitoring can reduce or eliminate likely impacts so that a full EA will not be required. If the applicant believes this to be the case, the Environmental Review Report must argue this case clearly and thoroughly. Proceed to Step 5.

STEP 5. WRITE THE ENVIRONMENTAL REVIEW REPORT, IF REQUIRED

The Environmental Review Report presents the environmental issues associated with the proposed activities. It also documents mitigation and monitoring commitments. Its purpose is to allow the applicant and USAID to evaluate the likely environmental impacts of the project.

For moderate risk activities, the Environmental Review Report is typically a SHORT 2–3 page document. The Report will typically be longer when (1) activities are of higher or unknown risk, and (2) when a number of impacts and mitigation measures are being identified and discussed.

The Environmental Review Report follows the outline below:

- A. **Summary of Proposal.** Summarize background, rationale and outputs/results expected. (reference to proposal, if appropriate).
- B. **Description of activities.** For all moderate and high-risk activities listed in Table 1 of the form, succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during all project phases and who will undertake them. (All of this information can be provided in a table). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.
- C. **Environmental Situation & Host Country environmental requirements.** Describe the environmental characteristics of the site(s) where the proposed activities will take place. Focus on site characteristics of concern—e.g., water supplies, animal habitat, steep slopes, etc. With regard to these critical characteristics, is the environmental situation at the site degrading, improving, or

stable? In this section, also describe applicable host country environmental regulations, policies and practices.

- D. Evaluation of Activities and Issues with Respect to Environmental Impact Potential.** Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with abandoning, restoring or reusing the site at the end of the anticipated life of the facility or activity.

Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.)

- E. Environmental Mitigation Actions (including monitoring).** Provide a workplan and schedule identifying the following:

Mitigation measures. Identify the means taken to avoid, reduce or compensate for impacts. (For example, restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents.) If standard mitigation or best practice guidance exists and is being followed, cite this guidance.

Monitoring Indicate how mitigation measures will be monitored to ensure that they accomplish their intended result. If some impacts are uncertain, describe the monitoring which will be conducted to identify and respond to these potential impacts.

Responsible parties. Identify *who* will undertake mitigation and who will conduct the monitoring, and at what frequency.

- F. Other Information.** Where possible and as appropriate, include photos of the site and surroundings; maps; and list the names of any reference materials or individuals consulted.
(Pictures and maps of the site can substantially reduce the written description required in parts B & C)

**STEP 6. BASED ON THE ENVIRONMENTAL REVIEW, REACH
A RECOMMENDED DETERMINATION FOR EACH HIGH-RISK
OR UNKNOWN/MODERATE-RISK ACTIVITY**

For each high-risk or unknown/moderate-risk activity, the environmental review will help you decide between one of three recommended determinations:

- **no significant adverse impacts.** The activity in question will not result in significant, adverse environmental impacts. Special mitigation or monitoring is not required. Typically, this conclusion is not appropriate for high-risk activities.
- **no significant adverse impacts given specified mitigation and monitoring** With mitigation and monitoring as specified in the Environmental Review Report, the activities in question will not result in significant adverse environmental impacts.
- **significant adverse impacts.** The activities in question is likely to cause significant adverse environmental impacts and cannot be mitigated with best practices or other measures. A full environmental assessment will be required.

For each high-risk or unknown/moderate-risk activity, indicate your “recommended determination” in Section B of the form.)

STEP 7: SUMMARIZE RECOMMENDED DETERMINATIONS

In section C of the form, summarize your recommended determinations by checking ALL categories indicated in Table 1.

**STEP 8. SIGN CERTIFICATIONS (SECTION D OF FORM)
STEP 9. SUBMIT FORM TO USAID PROJECT OFFICER.
ATTACH ENVIRONMENTAL REVIEW REPORT, IF ANY.**

Supplemental Environmental Review Form for Natural Resources Programs



USAID/mission or bureau name

Supplemental screening questions for natural resources activities under the XXX project (or program)

PURPOSE

This is a supplement to the “Instructions for Environmental Review under the XXX project.” It is to be used for natural resources-based activities, including:

- Community-Based Natural Resource Management (CBNRM)
- Ecotourism
- Natural resources-based enterprise development with micro- and small enterprises

This supplement provides additional questions to ascertain whether these proposed activities should be categorized as “very low risk:”

- If the answers to ALL the questions that follow are “NO,” then the proposed CBNRM or Ecotourism activity is considered “very low risk.”
- If the answer to ANY question is “YES,” the activity CANNOT be considered “very low risk.”

SCREENING QUESTIONS

Will the activities...	YES	NO
Natural Resources		
Accelerate erosion by water or wind?		
Reduce soil fertility and/or permeability?		
Alter existing stream flow, reduce seasonal availability of water resources?		
Potentially contaminate surface water and groundwater supplies?		
Involve the extraction of renewable natural resources?		
Lead to unsustainable use of renewable natural resources such as forest products?		
Involve the extraction of non-renewable natural resources?		
Restrict customary access to natural resources?		
Reduce local air quality through generating dust, burning of wastes or using fossil fuels and other materials in improperly ventilated areas?		
Affect dry-season grazing areas and/or lead to restricted access to a common resource?		
Lead to unsustainable or unnecessarily high water extraction and/or wasteful use?		
Ecosystems and Biodiversity		
Drain wetlands, or be sited on floodplains?		
Harvest wetland plant materials or utilize sediments of bodies of water?		
Lead to the clearing of forestlands for agriculture, the over-harvesting of valuable forest species?		

Will the activities...	YES	NO
Promote in-forest bee keeping?		
Lead to increased hunting, or the collection of animals or plant materials?		
Increase the risks to endangered or threatened species?		
Introduce new exotic species of plants or animals to the area?		
Lead to road construction or rehabilitation, or otherwise facilitate access to fragile areas (natural woodlands, wetlands, erosion-prone areas)?		
Cause disruption of wildlife migratory routes?		
Agricultural and Forestry Production		
Have an impact on existing or traditional agricultural production systems by reducing seed availability or reallocating land for other purposes?		
Lead to forest plantation harvesting without replanting, the burning of pastureland, or a reduction in fallow periods?		
Affect existing food storage capacities by reducing food inventories or encouraging the incidence of pests?		
Affect domestic livestock by reducing grazing areas, or creating conditions where livestock disease problems could be exacerbated?		
Involve the use of insecticides, herbicides and/or other pesticides?		
Community and Social Issues		
Have a negative impact on potable water supplies?		
Encourage domestic animal migration through natural areas?		
Change the existing land tenure system?		
Have a negative impact on culturally important sites in the community?		
Increase in-migration to the area?		
Create conditions that lead to a reduction in community health standards?		
Lead to the generation of non-biodegradable waste?		
Involve the relocation of the local community?		
Potentially cause or aggravate land-use conflicts?		



USAID/mission or bureau name:
Environmental Review & Report Approval Form for xxx
Program/Activities

NOTE: FOLLOW, BUT DO NOT SUBMIT, THE ABOVE INSTRUCTIONS.

A. APPLICANT INFORMATION

Organization	Parent grant or project
Individual contact and title	Address, phone & email (if available)
Proposed activity (brief description)	Amount of funding requested
Location of proposed activity	Start and end date of proposed activity

B. ACTIVITIES, SCREENING RESULTS, AND RECOMMENDED DETERMINATION

Proposed activities (continue on additional page if necessary)	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate/unknown and high-risk activities)		
	Very Low Risk	High-Risk*	Moderate risk or unknown*	No significant adverse impact	With specified mitigation, no significant adverse impact	Significant Adverse impact
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						

*These screening results require completion of an Environmental Review Report

C. SUMMARY OF RECOMMENDED DETERMINATIONS (CHECK ALL THAT APPLY)

The proposal contains. . .	<i>(equivalent Regulation 216 terminology)</i>
<input type="checkbox"/> Very low risk activities	<i>categorical exclusion(s)</i>
<input type="checkbox"/> After environmental review, activities determined to have no significant adverse impacts*	<i>negative determination(s)*</i>
<input type="checkbox"/> After environmental review, activities determined to have no significant adverse impacts, given	<i>negative determination(s) with conditions*</i>

specified mitigation and monitoring*	
<input type="checkbox"/> After environmental review, activities determined to have significant adverse impacts*	<i>positive determination(s)*</i>

***for these determinations, the form is not complete unless accompanied by Environmental Review Report**

D. CERTIFICATION:

I, the undersigned, certify that:

1. the information on this form is correct and complete
2. the following actions have been and will be taken to assure that the activity complies with environmental requirements established for this Project:
 - Those responsible for implementing this activity have received training in environmental review AND training and/or documentation describing essential design elements and best practices for activities of this nature.
 - These design elements and best practices will be followed in implementing this activity.
 - Any specific mitigation or monitoring measures described in the Environmental Review Report will be implemented in their entirety.
 - Compliance with these conditions will be regularly confirmed and documented by on-site inspections during the activity and at its completion.

(Signature) _____

(Date) _____

(Print name) _____

BELOW THIS LINE FOR USAID USE ONLY

CLEARANCE RECORD

USAID Project Officer	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID MEO	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID REO*	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			
USAID BEO*	(print name)	(signature)	(date)
<input type="checkbox"/> Clearance given			
<input type="checkbox"/> Clearance denied			

*REO and BEO approval required for all “high risk” screening results and for determinations of “significant adverse impacts”

Note: if clearance is denied, comments must be provided to applicant